REMARKS/DISCUSSION OF ISSUES

Specification. The Applicant has amended the Abstract herein to correct format errors in the Abstract. No new matter was introduced by the amendment of the Abstract herein.

Claims 1-15. In the Non-Final Office Action, Examiner Wozniak rejected pending claims 1, 2, 6, 7, 11 and 12 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,678,039 to *Hinks* et al. in view of U.S. Patent No. 5,664,206 to *Murrow* et al.; and pending claims 3-5, 8-10 and 13-15 under 35 U.S.C. §103(a) as being unpatentable over *Hinks* et al. in view of *Murrow* and in further view of U.S. Patent No. 6,092,037 to *Stone* et al. The Applicant responds to these rejections as subsequently recited herein, and respectfully requests reconsideration and further examination of the present application under 37 CFR § 1.112.

As to the §103(a) rejections of pending claims 1-15, the Applicant has thoroughly considered Examiner Wozniak's remarks concerning the patentability of pending claims 1, 2, 6, 7, 11 and 12 over *Hinks* in view of *Murrow*, and claims 3-5, 8-10 and 13-15 over *Hinks* in view of *Murrow* and in further view of *Stone*. The Applicant has also thoroughly read both *Hinks*, *Murrow* and *Stone*. To warrant these §103(a) rejections of pending claims 1-15, all of the claim limitations recited in claims 1, 2, 6, 7, 11 and 12 must be taught or suggested by the combination of *Hinks* and *Murrow*, and *Stone*, and all of the claim limitations recited in claims 3-5, 8-10 and 13-15 must be taught or suggested by the combination *Hinks*, *Murrow* and *Stone*. See, MPEP §2143. The Applicant respectfully traverses these §103(a) rejections of claims 1-15, because *Hinks* and *Murrow* and *Stone* in combination fail to disclose the following limitations of independent claims 1, 6 and 15:

1. "receiving a translation file corresponding to the control file, said translation file including one or more target language files of the human language text in the target language and a target manifest listing said target language files"; "comparing the source manifest and the target manifest"; "accepting the translation file when a comparison of the source manifest and the target manifest collectively indicate a complete translation of the human language text from the source language to the target language"; and "rejecting the translation file when a comparison of the source manifest and the target manifest collectively indicate an incomplete translation of the human language text from the source language to the target language" as recited in independent claim 1;

2. "means for receiving a translation file corresponding to the control file, said translation file including one or more target language files of the human language text in the target language and a target manifest listing said target language files"; "means for comparing the source manifest and the target manifest"; "means for accepting the translation file when a comparison of the source manifest and the target manifest collectively indicate a complete translation of the human language text from the source language to the target language"; and "means for rejecting the translation file when a comparison of the source manifest and the target manifest collectively indicate an incomplete translation of the human language text from the source language to the target language" as recited in independent claim 6; and

3. "computer readable code for receiving a translation file corresponding to the control file, said translation file including one or more target language files of the human language text in the target language and a target manifest listing said target language files"; "computer readable code for comparing the source manifest and the target manifest"; "computer readable code for accepting the translation file when a comparison of the source manifest and the target manifest collectively indicate a complete translation of the human language text from the source language to the target language"; and "computer readable code for rejecting the translation file when a comparison of the source manifest and the target manifest collectively indicate an incomplete translation of the human language text from the source language to the target language" as recited in independent claim 11

As to the traversal, *Morrow* and *Stone* clearly do not teach or suggest the aforementioned underlined limitations of independent claims 1, 6 and 11. A careful review of *Hinks* reveals the fact that *Hinks* also fails to teach or suggest the aforementioned underlined limitations of independent claims 1, 6 and 11.

Specifically, as illustrated in FIG. 3, *Hinks* teaches Software Translation Kit (STK) system 300 having a TShell 310 coupled to an Export/Import module 300 and various Editors 350 The Export/Import module 300 itself includes a parsing engine to extract strings and translatable information from application programs. It functions as a front end parser to "translatable" sources, providing data conversion as needed.

In operation, a resource file 325 for an original program 317 may be obtained from the original source files 313, or may be generated from the original program 317 by decompiling the resources bound to the original program 317 into a resource file 325. From there, Export/Import (EXPIMP) module 330 parses the resource file 325 into a Translation Table 340, which is typically stored as a database table. The Translation Table 340 encapsulates all the information that is known or can be derived from the various resources and stores them in a format which may be utilized by the various editors 350

Using the editors 350, which may include a string editor, menu editor, dialog editor, and the like, an end user (translator) can easily access and manipulate the various resources of the program for carrying out translation. The translations themselves are stored back in the Translation Table 340. Once the end-user translator has completed the task of translating the resources, the translated text is merged back to sources. The Export/Import module 300 is again employed, this time for generating a translated resource file 360. The translated resource file 360 is similar to the original resource file 325, except that any necessary translations (e.g., translating an English text string into a Spanish text string) have been carried out. In addition to translating text strings, other graphical user interface modifications, such as resizing of resources, have also been carried out

Once the translated resource file 360 has been generated, the target product is rebuilt with the new sources. The file 360 may be simply stored back with the source files 373, as a translated resource file(s); or, the translated resource file may be compiled and bound back into the target program 377 directly. See, *Hinks* at column 2, line 66 to column 3, line 39; and at column 7, line 54 to column 8, line 37.

By teaching a creation of the Translation Table 340 from a parsing of the original resource file 325, *Hinks* arguably teaches a distribution of original resource file 325 and a source manifest to an end-user translator via TShell 310 and Editors 350. However, *Hinks* teaches away from any need to generate a "target manifest" and associated limitations as recited in the claims 1-15 by teaching an access to the Translation Table 340 by the end-user translator for purposes of translating each string of the original resource file 325 as stored in a record of the Translation Table 340 whereby each translated string is stored in the same record as the respective original string. In fact, the only scenario where a "target manifest" and associated limitations as recited in the claims 1-15 would be required in *Hinks* is if *Hinks* taught or suggest a creation by the end-user translator of a new Translation Table separate and distinct from the Translation Table 340 as each record of the Translation Table 340 was being translated by the end-user translator whereby a comparison of the source manifest of Translation Table 340 and a translated manifest of the new Translation Table would be needed to ensure the translated resource file 360 would be a complete translation of the original resource file 325. *Hinks* does not teach or suggest such a scenario and therefore fails to teach or suggest the aforementioned underlined limitations of independent claims 1, 6 and 11

Withdrawal of the rejection of claims 1, 2, 6, 7, 11 and 12 under 35 U.S.C. §103(a) as being unpatentable over *Hinks* in view of *Murrow*, and the rejection of claims 3-5, 8-10 and 13-15 under 35 U.S.C. §103(a) as being unpatentable over *Hinks* in view of *Murrow* and in further view of *Stone* are respectfully requested.

January 26, 2005
Case No.: AUS920010148US1 (9000/22)
Serial No.: 09/820,585
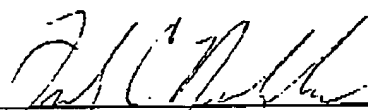Filed: March 29, 2001
Page 13 of 14

CONCLUSION

The Applicants respectfully submit that claims 1-15 as listed herein fully satisfy the requirements of 35 U.S.C. §§102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested.

Dated: **January 26, 2005**

Respectfully Submitted,
James N. Andrews, et al

CARDINAL LAW GROUP
Suite 2000
1603 Orrington Avenue
Evanston, Illinois 60201
Phone: (847) 905-7111
Fax: (847) 905-7113

Frank C. Nicholas
Registration No. 33,983
Attorney for Applicant